



Order Filed on May 3, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Inez M. Markovich, Esq.

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Counsel for National Financial Solutions, LLC

In re:

LORI KIM ANDREWS JONES
A/K/A LORI-KIM ANDREWS,
A/K/A LORI-KIM VICTA,

Debtor.

Chapter 13

Case No. 21-16020 (ABA)

**CONSENT ORDER RESOLVING THE LIMITED OBJECTION
OF NATIONAL FINANCIAL SOLUTIONS, LLC TO
CONFIRMATION OF DEBTOR'S AMENDED CHAPTER 13 PLAN**

The relief set forth on the following pages, numbered two(2) through three (3), is hereby

ORDERED.

DATED: May 3, 2022

A handwritten signature in black ink, appearing to read "ABJ".

Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

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Debtor: Lori Kim Andrews Jones a/k/a Lori-Kim Andrews a/k/a Lori-Kim Victa

Case No.: 21-16020 (ABA)

Title: Consent Order Resolving the Limited Objection of National Financial Solutions, LLC to Confirmation
of Debtor's Amended Chapter 13 Plan

THIS MATTER having been brought before the Court by McCarter & English, LLP, attorneys for secured creditor National Financial Solutions, LLC ("NFS"), by way of the Limited Objection (the "Limited Objection") (Dkt. No. 42) to the confirmation of the Modified Chapter 13 Plan dated January 25, 2022 (Dkt. No. 32) (the "Plan") proposed on behalf of Lori Kim Andrews Jones (the "Debtor"); and counsel for NFS (Inez M. Markovich, Esq.) and counsel for the Debtor (Andrew B. Finberg, Esq.) having reached an amicable resolution of the matter; and the Court having considered the representations made by the parties; and for good cause shown,

IT IS on this ____ day of _____, 2022,

ORDERED that any agreement of sale between Debtor, as seller, and any third-party buyer (an "Agreement of Sale") with respect to Debtor's real property located at 308 North Clarendon Avenue, Margate, NJ 08402 (the "Property") shall be subject to NFS's review and approval;

ORDERED that Debtor shall consummate the sale of the Property pursuant to an Agreement of Sale on or before July 1, 2022; and it is further

ORDERED that Debtor is to make post-petition payments in accordance with the terms of the Loan Documents¹; and it is further

ORDERED that, pursuant to the Plan, upon closing of the aforesaid sale of the Property, Debtor shall pay NFS the following amounts from the sale proceeds on account of its secured claim No. 11-1 filed in the above-captioned case (as may be amended or supplemented from time to time): the entire outstanding

¹ Any capitalized terms not defined herein shall have the meaning ascribed in the Limited Objection.

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Debtor: Lori Kim Andrews Jones a/k/a Lori-Kim Andrews a/k/a Lori-Kim Victa
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of Debtor's Amended Chapter 13 Plan

principal balance of the Loan, together with any and all accrued and unpaid interest, late charges, and
~~ongoing legal fees, all determined in accordance with the Loan Documents as of the date of such payment~~
in full to NFS, whether or not NFS has previously billed Debtor for any such amounts; and it is further

ORDERED that, in the event Debtor fails to sell the Property pursuant to an Agreement of Sale on or before July 1, 2022, the agreement set forth in this consent order shall automatically become null and void, and NFS reserves all of its rights and remedies under the Loan Documents and applicable law, including the right to collect all accrued and unpaid interest, late charges, and ongoing legal fees and costs in accordance with the Loan Documents, whether or not NFS has previously billed Debtor for any such amounts; and it is further

ORDERED that NFS' objection to confirmation is hereby resolved; and it is further

ORDERED that the Bankruptcy Court shall retain jurisdiction with respect to any matter related to or arising from the implementation or interpretation of this Order.

[Consent Signature Page Follows]

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Debtor: Lori Kim Andrews Jones a/k/a Lori-Kim Andrews a/k/a Lori-Kim Victa

Case No.: 21-16020 (ABA)

Title: Consent Order Resolving the Limited Objection of National Financial Solutions, LLC to Confirmation
of Debtor's Amended Chapter 13 Plan

The undersigned consent and agree
to the entry of this Stipulation and Consent Order:

Law Offices of Andrew B. Finberg, LLC



Andrew B. Finberg, Esq.
525 Route 73 South, Suite 200
Marlton, NJ 08053
Telephone (856) 988-9055
Email: andy@sjbankruptcylaw.com

Counsel for Debtor

Dated: April 29, 2022

MCCARTER & ENGLISH, LLP



Inez M. Markovich, Esq.
1600 Market Street, Suite 3900
Philadelphia, PA 19103
Telephone (215) 979-3854
Email: imarkovich@mccarter.com

Counsel for National Financial Solutions, LLC

Dated: April 29, 2022

In re:
Lori Kim Andrews Jones
Debtor

Case No. 21-16020-ABA
Chapter 13

District/off: 0312-1
Date Rcvd: May 03, 2022

User: admin
Form ID: pdf903

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Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol Definition

+ Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 05, 2022:

Recip ID	Recipient Name and Address
db	+ Lori Kim Andrews Jones, 48 Whyte Drive, Voorhees, NJ 08043-4152

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 05, 2022

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 3, 2022 at the address(es) listed below:

Name	Email Address
Andrew B. Finberg	on behalf of Debtor Lori Kim Andrews Jones andy@sjbankruptcylaw.com abfecf@gmail.com;finbergar39848@notify.bestcase.com
Denise E. Carlon	on behalf of Creditor U.S. Bank N.A., successor trustee to LaSalle Bank National Association, on behalf of the holders of Bear Stearns Asset Backed Securities I Trust 2007-HE7, Asset-Backed Certificates Series 2007-HE7 dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com
Gregory Lomax	on behalf of Creditor Laulette Birnbaum LLC glomax@lauletta.com, vmarr@lauletta.com
Harold N. Kaplan	on behalf of Creditor JPMORGAN CHASE BANK N.A. hkplan@rasnj.com, informationathnk@aol.com
Holly Smith Miller	on behalf of Creditor Regency Accounts LLC hsmiller@gsbblaw.com

District/off: 0312-1

User: admin

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Date Rcvd: May 03, 2022

Form ID: pdf903

Total Noticed: 1

Holly Smith Miller

on behalf of Plaintiff Regency Accounts LLC hsmiller@gsbblaw.com

Inez M. Markovich

on behalf of Creditor National Financial Solutions LLC imarkovich@mccarter.com, rstratz@andersonkill.com

Isabel C. Balboa

ibalboa@standingtrustee.com

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on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com summarymail@standingtrustee.com

Sindi Mncina

on behalf of Creditor JPMORGAN CHASE BANK N.A. smncina@raslg.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 11